

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 07 C 6483
)	
J AND R INSTALLATIONS, INC.,)	JUDGE ELAINE E. BUCKLO
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on December 28, 2007, request this Court enter judgment against Defendant, J AND R INSTALLATIONS, INC., an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On December 28, 2007, this Court entered default against Defendant and set a prove-up hearing for January 18, 2008. On January 16, 2008, at the request of Plaintiffs' counsel, the prove-up hearing was rescheduled to February 1, 2008. On January 22, 2008, the prove-up hearing was rescheduled to February 15, 2008.

2. Plaintiffs filed the instant litigation to recover delinquent contributions and liquidated damages due for August 2007 forward.

3. On January 18, 2008, Defendant remitted \$24,631.64 toward contributions and liquidated damages for August 2007 through November 2007.

4. On February 6, 2008, Defendant submitted its December 2007 report. After application of a partial payment of \$1,328.96, which was applied toward the December 2007

contributions, Defendant is still delinquent in contributions to the Funds in the amount of \$5,813.24.
(See Affidavit of Scott P. Wille).

5. Additionally, the amount of \$581.32 is due for liquidated damages. (Wille Aff. Par. 5).

6. In addition, Plaintiffs' firm has expended \$70.00 for costs and \$506.25 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

7. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$6,970.81.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$6,970.81.

/s/ Beverly P. Alfon

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 14th day of February 2008:

Sheldon L. Lebold
Sheldon L. Lebold & Associates, Ltd.
16061 S. 94th Avenue
Orland Hills, IL 60487

I further certify that I sent the above-referenced document on or before the hour of 4:00 p.m. this 14th day of February 2008, via facsimile, to:

Sheldon L. Lebold
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/s/ Beverly P. Alfon

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